



Policy for Whistle Blowing

Objective and Scope

In line with requirements of Code of Corporate Governance, the Board (BOD) has developed Whistle Blowing Policy.

The Whistle Blowing Policy formalizes the company's commitment to enabling its all stake holders including employees, shareholders, customers, vendors and other business associates to make fair and prompt disclosure of circumstances where it is genuinely believed that the company's business is being carried out in an inappropriate manner or in violation of applicable laws, or the company's policies, procedures, values.

The Company's Whistle blowing Policy encourages and enables all concerned to raise serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside.

Whistle Blowing

The original voluntary/protected disclosure, in public interest by Whistle Blower, on an ongoing, suspected, or anticipated malpractice resulting in contravention of administrated legislation by the Company.

Whistle blower includes any natural person who provides voluntary disclosure, in good faith.

Whistle Blowing Mechanism

Whistle Blower Policy ("the Policy") is a mechanism to help alert the Management and bring to its attention promptly and directly, any unethical behavior, suspected fraud or abrasion or irregularity in the Company practices which is not in line with UDLI code of conduct and business practices or the law of the land, without any fear or threat of being victimized, by responsible individual

Policy is not designed to question financial or business decisions taken by the organization and it does not apply to employees' career related issues like promotions, transfers, relocations, trainings etc. for which separate procedure exists

Whistle Blowing Channels

- For employees, the first port of call to raise a concern is the relevant Line Manager or HR manager.
- Reporting can be made by employees / other parties directly to Audit Committee at rahaela@gmail.com

Evaluation and Response

After the concern has been evaluated, the Company will write to the complainant:

- acknowledging that the concern has been received;
- indicating how it is proposed to be dealt with;
- informing whether further investigations will take place, and if not, why not.

The complainant is not expected to prove the truth of allegation, but should be able to demonstrate that there are sufficient grounds for concern

All whistle blowing cases shall be presented to the Board Audit Committee for its information and consideration as part of its quarterly review.

Confidentiality and Protection

The policy assures that all complaints will be handled in complete confidence, and that the identity of the complainant will not be revealed to management. In the unlikely event that the identity of Whistle Blower is revealed to any person in the Company, it will be ensured that the complainant is not subjected to any form of detrimental treatment.

Contact Head Office: 1st Floor, Business Enclave, 77-C , 12th Commercial Street Off Kh-e Ittehad, DHA Phase-2 (Ext.) Karachi)